

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

VIRTAMOVE, CORP.,	§	
Plaintiff,	§	Case No. 2:24-cv-00093-JRG
	§	(Lead Case)

v.

HEWLETT PACKARD ENTERPRISE	§	JURY TRIAL DEMANDED
COMPANY,	§	
Defendants.	§	

VIRTAMOVE, CORP.,	§	
Plaintiff,	§	Case No. 2:24-cv-00064-JRG
	§	(Member Case)

v.

INTERNATIONAL BUSINESS	§	JURY TRIAL DEMANDED
MACHINES CORP.,	§	
Defendants.	§	

JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER AND DISCOVERY ORDER

Plaintiff VirtaMove, Corp. (“Plaintiff”) and Defendants Hewlett Packard Enterprise Company (“HPE”) and International Business Machines Corp. (“IBM”) (collectively, the “Parties”) file this Joint Motion for Entry of Protective Order and Discovery Order. Counsel for the Parties have diligently conferred regarding the information contained in the proposed Docket Control Order for this case and have agreed to the deadlines proposed therein. Accordingly, the Parties submit a proposed Discovery Order (Exhibit A) and a proposed Protective Order (Exhibit B) for the Court’s consideration.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record are being served with a copy of this document via the Court's CM/ECF system on June 20, 2024.

/s/ Peter Tong
Peter Tong

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that pursuant to Local Rule CV-7(h), counsel for Defendants conferred with counsel for Plaintiff. All parties agree to the filing of this joint motion.

/s/ Peter Tong
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